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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

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12 **AMERICAN AIRLINES, a California limited liability company, on behalf of itself and all others similarly situated,**

13 | Plaintiffs,

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15 | GOOGLE, INC., a Delaware corporation,

16 Defendant.

Case No. C 06-2057 JF

**DECLARATION OF VICTOR B.  
GOODMAN IN SUPPORT OF  
OPPOSITION TO DEFENDANT'S  
SPECIAL MOTION TO STRIKE  
PURSUANT TO CCP § 425.16**

18 I, VICTOR B. GOODMAN, HEREBY DECLARE AS FOLLOWS:

19       1. My name is Victor B. Goodman. This Declaration is based upon my personal  
20 knowledge and, where noted, on information and belief following a review of relevant business  
21 records or independent investigation, or both, as the case may be regarding the matters set forth  
22 below.

23        2. I am member and a manager of KinderStart.com LLC, a California limited  
24 liability company (“KinderStart”), which is headquartered in Norwalk, California.

25       3.     After KS.com was launched in 2000, by 2005 Google searches by visitors became  
26 the largest source of our referrals and a vital, essential channel of exposure of KinderStart to the  
27 Internet. KinderStart does not own and operate a separate physical location to the outside world.

DECLARATION OF VICTOR B. GOODMAN RE  
OPPOSITION TO DEFENDANT'S SPECIAL  
MOTION

Case No. C 06-2057 JF

1           4. After KS.com was abruptly and intentionally removed from Google's Web Index  
2 on March 19, 2005 or later, its PageRank sank to '0' and did not rise for the rest of 2005. Over  
3 the next several months, the monthly traffic of visitors to KS.com fell by 70% and the monthly  
4 revenue from KinderStart's participation in the AdSense program fell by 80%.

5        5.        In the history of KinderStart and KS.com, we have not issued any press releases  
6 or intentionally sought to put the issues of KS.com's traffic or its PageRank as a matter of public  
7 controversy. The only publicity has been the result of our outside attorney and his representation  
8 of the class of plaintiffs in this litigation.

9 I DECLARE UNDER PENALTY OF PERJURY, that the above is based on my personal  
10 knowledge, and where indicated, upon information and belief.

11 Executed on this 8 day of June, 2006 in Los Angeles, California.

By: *Victor B. Goodman*